

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)
)
Facilitating the Deployment of Text-to-911 and) PS Docket No. 11-153
Other Next Generation 911 Applications)
)
Framework for Next Generation 911 Deployment) PS Docket No. 10-255

**REPLY COMMENTS OF APCO INTERNATIONAL
REGARDING SECTION III.A. OF THE
FURTHER NOTICE OF PROPOSED RULEMAKING**

The Association of Public-Safety Communications Officials-International, Inc. (“APCO”) hereby submits the following brief reply to comments filed in response to Section III.A. of the Commission’s *Further Notice of Proposed Rulemaking*, FCC 12-149 (released December 23, 2012) (“*FNPRM*”), in the above-captioned proceedings.

The initial comments of APCO and other parties regarding Section III.A. provide more than sufficient basis for the Commission to proceed with its proposed rules regarding automatic “bounceback” messages when a text to 9-1-1 cannot be delivered to the relevant PSAP. However, a few issues require the following brief reply.

First, APCO agrees with comments suggesting that the Commission modify its definitions to clarify that non-service initialized (NSI) handsets are not subject to text-to-9-1-1 requirements.¹

Second, APCO continues to be very concerned with subscriber testing of text-to-9-1-1 capability as suggested by some parties. Subscriber testing would run counter to long standing public education that 9-1-1 should only be used when there is a genuine emergency. The number

¹ CTIA comments at 10.

of “test” texts could also easily outnumber the potential number of actual emergency texts, especially since the average subscriber is unlikely to ever be in a situation where a text to 9-1-1 is a better alternative than a voice call.² That volume of test texts could disrupt PSAP operations. Various technical components of text-to-9-1-1 do need to be tested, of course, but such testing should be in a controlled “closed-loop” to prevent disruption to PSAPs and other elements of the 9-1-1 infrastructure.

Finally, the bounceback messaging should be transparent to subscribers, regardless whether they are on the home network or roaming. In *all* cases, an individual seeking assistance via a text message to 9-1-1 needs to know whether or not the text is delivered to a PSAP.

CONCLUSION

Therefore, for the reasons set forth above and in APCO’s initial comments, the Commission should proceed with its proposed rules to require bounceback messages as set forth in Section III.A. of the *FNPRM*.

Respectfully submitted,

/s/

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² As APCO emphasized in its prior comments, text-to-9-1-1 should only be used when a voice call to 9-1-1 is not feasible, such as emergencies being reported by individuals with hearing or speech disabilities, rare situations in which a voice call could be dangerous, or when voice calls cannot be delivered because of wireless network congestion.